

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
GREENVILLE DIVISION**

**IN RE:**

**CAH ACQUISITION COMPANY #4,  
INC., d/b/a DRUMRIGHT REGIONAL  
HOSPITAL,**

**Debtor.**

**Case No. 19-01228-5-JNC**

**Chapter 11**

**OBJECTION TO INITIAL APPLICATION BY SPILMAN THOMAS & BATTLE, PLLC  
AS COUNSEL FOR THE DEBTOR FOR ALLOWANCE OF INTERIM  
COMPENSATION AND REIMBURSEMENT OF EXPENSES  
[MARCH 13, 2019 THROUGH APRIL 25, 2019]**

NOW COMES Thomas W. Waldrep, Jr., trustee in the above-captioned cases (the “Trustee”), by and through the undersigned counsel, and hereby files this Objection to the *Initial Application by Spilman Thomas & Battle, PLLC as Counsel for the Debtor for Allowance of Interim Compensation and Reimbursement of Expenses [March 13, 2019 through May 31, 2019]* (the “STB Fee Application”) [Dkt. No. 103]. In support of this Objection, the Trustee respectfully states as follows:

1. On March 17, 2019 (the “Petition Date”), the above-captioned debtor (the “Debtor”) filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.*
2. On March 18, 2019, the Court entered an Order approving the appointment of the Trustee [Dkt. No. 4]. On March 29, 2019, the Court entered an Order rendering permanent the Trustee’s appointment [Dkt. No. 30]. The Trustee was, during the pendency of the Debtor’s case, the duly appointed, qualified and acting trustee of the Debtor’s Estate.
3. On April 24, 2019, the Court entered an Order dismissing the Debtor’s case [Dkt. No. 84]. The case remains open for the limited purpose of administrative matters.

4. On July 17, 2019, Spilman, Thomas & Battle, PLLC (the “Applicant”) filed the STB Fee Application.

5. On August 5, 2019, the Bankruptcy Administrator for the Eastern District of North Carolina (the “BA”) filed her Objection (the “BA’s Objection”) [Dkt. No. 107] to the STB Fee Application. The BA’s Objection is hereby incorporated by reference.

6. The Trustee files this Objection to the STB Fee Application for the reasons stated in the BA’s Objection.

WHEREFORE, the Trustee objects to the STB Fee Application and respectfully requests that such application be denied and such other and further relief as the Court deems just and proper.

Respectfully submitted, this the 7th day of August, 2019.

**WALDREP LLP**

/s/ Thomas W. Waldrep, Jr.

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing **OBJECTION TO INITIAL APPLICATION BY SPILMAN THOMAS & BATTLE, PLLC AS COUNSEL FOR THE DEBTOR FOR ALLOWANCE OF INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES [MARCH 13, 2019 THROUGH MAY 31, 2019]** was filed electronically in accordance with the local rules and was served upon all parties entitled to service thereof by electronic service through CM/ECF.

Dated: August 7, 2019

**WALDREP LLP**

/s/ Thomas W. Waldrep, Jr.

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